



May 7, 2010

Reply to Attn of: 140

TO: Distribution

FROM: 140/Chief Counsel

SUBJECT: Widely Attended Gathering Determination Regarding Attendance at Terra
10th Anniversary Reception

On May 11, 2010, the company SGT is sponsoring a reception to recognize the 10th anniversary of Terra, the first of the Earth Observing System (EOS) satellites, and its scientific discoveries. The event will be held at the NASA Goddard Visitor Center.

Approximately 175 people are expected to attend the event, representing NASA, NOAA, and various aerospace companies. The estimated cost per person is \$22.

Attendance at the event will allow NASA employees an opportunity to discuss Terra's contributions to science and our understanding of the Earth with the other attendees. I therefore conclude that NASA's interest in its employees attending this event outweighs any concern that attendance may, or may appear to, improperly influence NASA employees in the performance of their official duties.

Based on the above, I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR 2635.204(g). Accordingly, NASA employees whose duties do not substantially affect SGT may accept free attendance to the event for themselves and their guests.

NASA employees whose duties substantially affect SGT, for instance by way of procurement duties, should seek an individual determination regarding participation in this event from their local ethics counselor. Moreover, NASA employees who are in non-career positions in which the President's Executive Order of January 21, 2009 requires signing an ethics pledge may only attend if they reimburse the sponsor the cost of the refreshments they consume at the reception.

A handwritten signature in black ink, appearing to read "Robert M. Stephens".

Robert M. Stephens